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6 Attorneys for Defendant
SALVADOR ORTIZ-PADILLA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.
16

Case No. 1:21-cr-00239-JLT-SKO

**STIPULATION TO CONTINUE
SENTENCING; ORDER**

Date: February 18, 2025

Time: 9:00 a.m.

Judge: Hon. Jennifer L. Thurston

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the sentencing hearing
20 currently scheduled for November 25, 2024, at 9:00 a.m. may be continued to February 18, 2025,
21 at 9:00 a.m.

22 Mr. Ortiz-Padilla entered a plea of guilty to Count One of the Superseding Information
23 on July 29, 2024. *See* Dkt. #65. The matter was then scheduled for sentencing on November 25,
24 2024. *See* Dkt. #65. Mr. Ortiz-Padilla interviewed with the assigned probation officer thereafter.
25 The draft Presentence Investigation Report (PSR) was due to be submitted to the parties on
26 October 15, 2024. However, and for reasons explained by the assigned probation officer to the
27 parties, the draft PSR was filed on October 25, 2024. *See* Dkt. #66. Because the parties' informal
28 objections would otherwise be due by October 28, 2024, and because the parties require time to

1 look into additional information set forth in the PSR, the parties are requesting that the
2 sentencing hearing in this matter be continued. Additionally, the proposed date was selected in
3 order to provide counsel sufficient time to discuss the PSR in detail with Mr. Ortiz-Padilla and to
4 account for counsel's time commitments in other matters and scheduled leave occurring during
5 this time period. Accordingly, the parties are requesting to continue sentencing to February 18,
6 2025.

7 The government does not oppose the continuance of the sentencing in this matter to the
8 date proposed herein. The requested continuance is made with the intention of conserving time
9 and resources for both the parties and the Court. The government is in agreement with this
10 request and the requested date is a mutually agreeable date for all parties. As this is a sentencing
11 hearing, no exclusion of time is necessary.

12 Respectfully submitted,

13 PHILLIP A. TALBERT
14 United States Attorney

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16 Date: October 28, 2024

/s/ Justin Gilio
JUSTIN GILIO
Assistant United States Attorney
Attorney for Plaintiff

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19 HEATHER E. WILLIAMS
20 Federal Defender

21 Date: October 28, 2024

/s/ Reed Grantham
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
SALVADOR ORTIZ-PADILLA

ORDER

For the reasons set forth above, the sentencing hearing scheduled for November 25, 2024, at 9:00 a.m. be continued to February 18, 2025, at 9:00 a.m.

IT IS SO ORDERED.

Dated: **October 28, 2024**


UNITED STATES DISTRICT JUDGE